

August 14, 2019

Junya Inoue, President  
Water Gremlin Company  
4400 Otter Lake Road  
White Bear Township, MN 55110

**RE: Active trans 1,2- dichloroethylene release**

Dear Mr. Inoue:

On July 30, 2019, the Minnesota Pollution Control Agency (MPCA) received Water Gremlin's Remedial Investigation Report (Remedial Report) which contained the results of the soil, groundwater, surface water, and sediment sampling on its property, along with corrective actions that Water Gremlin proposed to undertake. The Remedial Report identified, among other things, that trans-1,2-dichloroethylene (DCE) is present in the soil samples taken below the building's sub-slab.

On August 6, 2019, the MPCA met with Water Gremlin and its consultant, Wenck Associates, to discuss the Remedial Report. During this meeting, Wenck Associates and Water Gremlin stated that DCE emissions are penetrating the concrete floor of the coating room and migrating to the soil. While the cause of the release is not confirmed, Water Gremlin and Wenck Associates stated they believe that because the coating room is under negative pressure, every time a door to the room is opened, or the pollution control equipment is shutdown, the room pressure changes, causing the DCE emissions in the air to penetrate the concrete floor and migrate to the soil beneath the building.

The MPCA has significant concerns that DCE was discovered in the soil below the sub-slab given that Water Gremlin has only been using FluoSolv, the solvent that contains DCE, since March 1, 2019. The MPCA believes that the release of DCE is likely to continue as long as coating operations continue, resulting in additional DCE accumulation in the soil below the sub-slab.

The MPCA requests that Water Gremlin **immediately cease coating operations that utilize FluoSolv**, until corrective measures to prevent additional DCE from migrating to the soil below the sub-slab are approved by the MPCA, completed, and confirmation of the effectiveness of the corrective measures has been determined. Water Gremlin has indicated it is working on corrective actions to address the ongoing release, including sealing the coating room floor.

The MPCA will continue to work with Water Gremlin on evaluating this option and other corrective actions addressed in the MPCA's response to the Remedial Report, which was provided to Water Gremlin on August 8, 2019. In the meantime, we expect that Water Gremlin will fully comply with this request to immediately cease coating operations that utilize Fluosolv.



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Please notify me as soon as possible, but no later than 3:00 pm on August 15, 2019, with your decision.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura Bishop', written in a cursive style.

Laura Bishop  
Commissioner

JC/SK/LF/CB:XX

cc: Colin O'Donovan, Attorney General's Office  
Leslie Fredrickson, MPCA  
Deb Klooz, MPCA  
Jennifer Carlson, MPCA  
Cory Boeck, MPCA  
Sarah Kilgriff, MPCA